

Exhibit I



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June 3, 2019

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Re: *Fuel Line Lenders First Set of Document Requests to AAFAF and PREPA*

Counsel:

As requested during our May 31, 2019 meet and confer, below is a summary of the materials that were produced in connection with the *Motion of National Public Finance Guarantee Corporation, Assured Guaranty Corp., Assured Guaranty Municipal Corp., and Syncora Guarantee Inc. for Relief from the Automatic Stay to Allow Movants to Enforce Their Statutory Right to Have a Receiver Appointed*, dated October 3, 2018 [ECF No. 975] (the “**Lift Stay Production**”) that the Puerto Rico Fiscal Agency and Financial Advisory Authority (“**AAFAF**”) and the Puerto Rico Electric Power Authority (“**PREPA**”) intend to produce in response to the *First Set of Document Requests of Cortland Capital Market Services LLC, as Administrative Agent, and Solus Alternative Asset Management LP to Financial Oversight and Management Board for Puerto Rico, the Puerto Rico Electric Power Authority, and the Puerto Rico Fiscal Agency and Financial Advisory Authority*, served on May 22, 2019 (collectively, the “**Requests**,” and each a “**Request**”).

Requests for PREPA Board Materials (Requests 12 & 14)

These requests seek production of PREPA Board resolutions and other related materials relating to the issuance of any PREPA Bonds that are currently outstanding. As noted in AAFAF and PREPA’s written responses, AAFAF and PREPA do not agree that these materials are within the proper scope of discovery on the Rule 9019 Motion because these materials have no bearing on whether the RSA falls above the lowest point in the range of reasonableness.

In the Lift Stay Production, PREPA produced all non-privileged PREPA Board resolutions, and documents underlying those resolutions, from August 2017 to December 2018. In the spirit

of compromise, and without conceding that these materials are relevant, subject to the entry of a protective order, AAFAF and PREPA will reproduce these materials in connection with the 9019 Motion.

Requests for PREPA Consulting Engineer Reports (Request 15)

This request seeks production of all reports filed with PREPA on or after May 4, 2012 by the Consulting Engineers pursuant to section 706 of the Trust Agreement. As noted in AAFAF and PREPA's written responses, AAFAF and PREPA do not agree that these materials are within the proper scope of discovery on the Rule 9019 Motion. Requesting seven years' worth of reports is not tailored to the issue before the court: whether the RSA falls above the lowest point in the range of reasonableness.

The Lift Stay Production referenced in PREPA and AAFAF's responses to Request No. 15 includes the reports from 2012 and 2013. In addition, the annual reports for 2009-2013 are available on PREPA's website.¹ PREPA will reproduce these materials in connection with the 9019 motion.

Requests for PREPA's Current Expenses and Revenues (Requests 16, 17, and 18)

These requests seek production of documents showing PREPA's current revenues and current and projected expenses. Requests 16, 17, and 18, are overbroad and unduly burdensome, particularly insofar as they seek "all" responsive documents and materials dating back to May 4, 2012, and information that is available from public sources.

In the Lift Stay Production, PREPA produced the following categories of documents:

- 13-Week Cash Flow updates from January 2018 showing PREPA's projected expenses and revenues.²
- PREPA's accounts receivable data since January 2018.
- PREPA's monthly reports to the Governing Board since July 2017, showing revenues, expenses, changes in net position, and accounts receivable.³
- Necessary maintenance expense spreadsheets (in PDF format) from FY14-15 to FY18-19, showing capital expenditure budgets.
- PREPA's Fiscal Plan Key Performance Indicator Reports to the FOMB from July 2018 to February 2019 showing revenues, reported monthly.

Subject to the entry of a protective order, AAFAF and PREPA will reproduce the above-listed materials to the Fuel Line Lenders.

¹ <https://acepr.com/es-pr/investors/Paginas/Financial-Information.aspx>.

² Also available on the AAFAF website since April 2018. <http://aafaf.pr.gov/reports.html#lr-prepa>.

³ Also available on the PREPA website since January 2009. <https://acepr.com/es-pr/investors/Paginas/Financial-Information.aspx>.

Requests for PREPA's Bank Account Information (Requests 20 and 21)

These requests seek production of the balances of various PREPA bank accounts, the location of the accounts, and any account control agreements or other similar agreements governing the accounts.

In the Lift Stay Production, PREPA produced cash in bank and time deposit accounts showing the value and location of PREPA's General Funds, Revenue Funds, Construction Funds, Reserve Maintenance Funds, Sinking Funds, and Self Insurance Funds since March 2018, reported at least monthly. PREPA also produced documents sufficient to evidence the value and location of PREPA's Sinking Funds on the petition date. AAFAF and PREPA will reproduce these materials in connection with the 9019 motion.

* * *

AAFAF and PREPA understand that the Fuel Line Lenders and the Financial Oversight and Management Board ("FOMB") are discussing the Requests pertaining to the status of the Fuel Line Loans and the Scotiabank and Citibank credit agreements (Requests Nos. 5-10, 22-23). We believe there are no outstanding disputes with AAFAF or PREPA beyond what is already under discussion with the FOMB.

/s/ Elizabeth L. McKeen

Elizabeth L. McKeen